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July 24, 2024

**VIA CM/ECF**

Hon. Naomi Reice Buchwald  
United States District Judge  
Southern District of New York  
40 Foley Square  
New York, NY 10007

**Re: *SoundExchange, Inc., v. Sirius XM Radio Inc.*, Case No. 1:24-cv-05491-NRB  
Consent Motion for Extension of Time to Answer**

Dear Judge Buchwald:


We represent Defendant Sirius XM Radio Inc. (“Sirius XM”) in the above-referenced action, which has arrived at this Court on transfer from the Eastern District of Virginia following a July 15, 2024 ruling on Sirius XM’s motion to dismiss, or in the alternative, to transfer venue. *See SoundExchange, Inc. v. Sirius XM Radio Inc.*, Case 1:23-cv-01083-PTG-JFA, ECF No. 33 (E.D. Va. July 15, 2024). Under Rule 12(a)(4)(A), the deadline for Sirius XM to serve its responsive pleading is July 29, 2024.

Pursuant to Federal Rule 6(b)(1), Local Civil Rules 5.2(b) and 7.1(d) of the United States District Courts for the Southern and Eastern Districts of New York, and Section 1(e) of the Court’s Individual Rules and Practices in Civil Cases, Sirius XM respectfully requests a two-week extension of time to respond to Plaintiff’s Complaint, until August 12, 2024. This is Sirius XM’s first request for an extension. Sirius XM has conferred with Plaintiff’s counsel about this request, and Plaintiff consents.

In light of the foregoing, Sirius XM respectfully requests that the Court set August 12, 2024, as the deadline for Sirius XM to respond to SoundExchange’s Complaint.

Application granted.

**So ordered.**

  
NAOMI REICE BUCHWALD  
UNITED STATES DISTRICT JUDGE

Dated: July 25, 2024  
New York, New York

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Respectfully submitted,

By: /s/ Todd Larson

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